UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES ex rel.) Civil Action No. 1:10-cv-01471
HEATHCOTE HOLDINGS CORP., INC., an Illinois corporation, Relator,))))
Plaintiffs,))) Judge: Hon. David H. Coar
V.)
LEAPFROG ENTERPRISES, INC.,)
Defendant.)
)

NOTICE OF MOTION

TO HEATHCOTE HOLDINGS CORP., INC., AND TO ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on July 7, 2010, at 9:00 a.m., or as soon thereafter as the matter may be heard, Defendant LEAPFROG ENTERPRISES, INC., by and through its attorneys, shall appear before the Honorable David H. Coar, or any judge sitting in his stead in Courtroom 1843 of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and shall present the following motion attached hereto:

LEAPFROG ENTERPRISES, INC.'S MEMORANDUM IN SUPPORT OF ITS MOTION TO TRANSFER VENUE.

Dated: June 24, 2010 COOLEY LLP

By: /s/ Thomas J. Friel, Jr.

Thomas J. Friel, Jr. (*pro hac vice*) Matthew P. Gubiotti (*pro hac vice*)

Erica C. Tierney (pro hac vice)
Cooley LLP
3000 El Camino Real
Five Palo Alto Square, Suite 400
Palo Alto, CA 94305-2155
(650) 843-5000
tfriel@cooley.com
mgubiotti@cooley.com
etierney@cooley.com

Brian D. Roche
Michael P. Bregenzer
Reed Smith LLP
10 South Wacker Drive
Chicago, Illinois 60606
(312) 207-1000
broche@reedsmith.com
mbregenzer@reedsmith.com

Attorneys for Defendant LEAPFROG ENTERPRISES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2010, a copy of the foregoing NOTICE OF MOTION was served via the Court's electronic filing system, on the following attorneys of record:

Richard J. Prendergast	Matthew S. Miller
Michael Thomas Layden	Law Offices of Matthew S. Miller
John C. Ellis	111 West Washington Street, Suite 1100
Richard J. Prendergast, Ltd.	Chicago, IL 60602
111 West Washington Street, Suite 1100	(312) 641-0881
Chicago, IL 60602	matt@matmillerlaw.com
(312) 641-0881	
rprendergast@rjpltd.com	
mlayden@rjpltd.com	
jellis@rjpltd.com	

/s/ Thomas J. Friel, Jr.	
--------------------------	--

863599/HN